

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

TYLER TECHNOLOGIES, INC., §
§
Plaintiff, § Cause No. 3:06-cv-1693
vs. §
§ ECF
VIRTUAL IMPACT PRODUCTIONS, INC., §
§
Defendant. §

**DEFENDANT'S MOTION FOR ENLARGEMENT
OF TIME TO FILE RESPONSE TO PLAINTIFF'S COMPLAINT**

Defendant Virtual Impact Productions, Inc., through its undersigned counsel and pursuant to FED. R. CIV. P. 6(b), hereby files this Motion for Enlargement of Time to File Response to Plaintiff's Complaint and in support states as follows:

1. Plaintiff filed its Complaint against Defendant on September 15, 2006.
2. Defendant respectfully requests additional time to investigate the factual allegations contained within Plaintiff's Complaint and prepare an appropriate response thereto. Accordingly, Defendant requests that the deadline to file and serve a responsive pleading to the Complaint be extended through and until Monday, November 6, 2006.
3. This extension will not unduly burden any party nor cause a delay in the trial of this cause.
4. Before filing this motion, Defendant sought an agreed extension of time from Plaintiff's counsel of record; however, Plaintiff's counsel has yet to respond to Defendant's request thus, compelling Defendant to seek relief from the Court.

WHEREFORE, Defendant Virtual Impact Productions, Inc. requests the Court grant it an enlargement of time to file and serve its responsive pleading to Plaintiff's Complaint until Monday, November 6, 2006.

Dated: October 19, 2006

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Eric W. Buether

Eric W. Buether
Attorney in Charge
Texas State Bar No. 03316880
E-mail: buethere@gtlaw.com
2200 Ross Avenue, Suite 5200
Dallas, Texas 75201
Phone: (214) 665-3664
Fax: (214) 665-5964

**ATTORNEY FOR DEFENDANT
VIRTUAL IMPACT PRODUCTIONS,
INC.**

CERTIFICATE OF CONFERENCE

I hereby certify that on October 18, 2006, I conferred with counsel for Plaintiff who stated that they would contact their client regarding Defendant's request for an extension of time to respond to Plaintiff's Complaint. To date, Plaintiff's counsel has not responded to our request and accordingly, I cannot represent to the Court whether opposing counsel opposes or does not oppose the relief sought herein.

/s/ Eric W. Buether

Eric W. Buether

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this 19th day of October, 2006. Any other counsel of record will be served by facsimile transmission and first class mail.

/s/ Eric W. Buether

Eric W. Buether

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